

AFFIDAVIT

I, William P. Akins, a Postal Inspector with the United States Postal Inspection Service (USPIS), being duly sworn, depose and state:

INTRODUCTION:

1. I am a Postal Inspector with the United States Postal Inspection Service, in Tucson, AZ, and have been employed as such since February of 2019. Since February of 2019, I have been stationed at the Tucson, Arizona office of the Phoenix Division. I attended the fourteen-week training course at the United States Postal Inspection Service Academy in Potomac, Maryland. There I received training related to violations of federal law including assaults, robberies, and criminal investigations of narcotics trafficking via the United States Mail. Prior to becoming a Postal Inspector, I was employed as a United States Border Patrol Agent for approximately 13 years. Throughout my law enforcement career, I have had extensive training and experience investigating a variety of criminal violations including controlled substances. During my almost 16-year career as a Federal Law Enforcement Officer, I have been involved in numerous criminal investigations which have resulted in arrests, recovery of evidence and seizure of property. I have also written and executed numerous search warrants resulting in the seizure of thousands of dollars and controlled substances.

DESCRIPTION OF SUBJECT PARCEL:

2. This affidavit is made in support of an Application and Affidavit for Search Warrant for a United States Postal Service (USPS) Priority Mail Express

(PME) parcel. The parcel has tracking number EI 229 724 085 US, bearing \$27.10 in postage, postmarked from Cowpens, South Carolina on December 22, 2021. It bears a return address of “Violdine Petithomme, 615 Cameron Jacob Ct, Cowpens, SC 29303” and is addressed to “Dora Guzman, 263 W View Point Dr #20, Nogales, Arizona 85621”. The article consists of a USPS white PME flat rate envelope measuring approximately 12” x 9” and weighing approximately 2 pounds and 7 ounces. It is hereafter referred to as “SUBJECT PARCEL 1”.

**BACKGROUND ON USPS DRUG INTERDICTION IN SOUTHERN ARIZONA
AND THE USPS DRUG MAIL PROFILING PROGRAM:**

3. From my training, personal experience, and the collective experiences related to me by other Postal Inspectors who specialize in investigations relating to the mailing of controlled substances and the proceeds from the sale of controlled substances, I am aware that the southern Arizona international border is a leading area for the entry of controlled substances from Mexico into the U.S. Based on the large quantities of controlled substances entering southern Arizona, controlled substances are frequently transported from southern Arizona via the United States Mail to areas across the United States, primarily to the large metropolitan areas in the eastern United States and Puerto Rico. It is also common for the proceeds from the sale of the controlled substances to be sent to southern Arizona via the United States Mail. By using the U.S. Mail to ship controlled substances, these drug

traffickers put unknowing postal employees who handle and deliver those mailings at risk.

4. Based on the frequent use of the United States Mail for the shipment of controlled substances from southern Arizona and California, Postal Inspectors in Tucson and other locations near the southwest border routinely observe inbound and outbound mail articles for suspicious characteristics common to mailings of drugs and drug proceeds. While there are many characteristics that experienced inspectors look for, the most common characteristics found are:
 - a. Suspected parcels are mailed to or from known drug destination areas, primarily the large metropolitan areas in United States and Puerto Rico.
 - b. The sender names and addresses on drug or drug proceeds parcels routinely contain misspellings, incomplete, inaccurate, unauthorized and/or fictitious information.
 - c. A tracking number is used to provide the trafficker the ability to track the parcel's progress to the point of delivery.
 - d. The postage was paid with cash which leaves no trail identifying the mailer.
5. Parcels found to meet some or all of the suspicious characteristics described in subsections "a" through "d" of this paragraph are further investigated by Postal Inspectors.

6. The facts contained in this affidavit are known to me and based on my training and experience along with discussions with other law enforcement agents.

The facts contained in this affidavit do not constitute all the facts I know regarding this investigation, but are sufficient facts to support the finding of probable cause.

INVESTIGATIVE DETAILS:

7. On December 23, 2021, during ongoing interdiction activities in Tucson, AZ, I observed SUBJECT PARCEL 1.

- a. It was mailed from South Carolina which is an area I know to be a destination for drug parcels and a source area for proceeds from the sale of those drugs.
- b. It has a tracking number. From my experience, I know that nearly all drug and drug proceeds parcels bear tracking numbers allowing the sender and receiver to track the progress of the shipment from origination to destination.
- c. There are no telephone number listed on the mailing label for the addressee. In my experience, legitimate mailers who use the USPS Priority Mail Express expedited service regularly include telephone numbers in the spaces provided on the label because they paid a premium price for the service and want to be contacted to help facilitate a timely delivery should a problem arise.
- d. The subject parcel was paid for in cash to keep the anonymity of the sender from being identified by law enforcement.

8. On December 23, 2021, I accessed “Thomson Reuters CLEAR” to check for records of the names and addresses listed on SUBJECT PARCEL 1.

Thomson Reuters CLEAR is an online service that provides an extensive collection of public records used primarily by corporate security departments and law enforcement agencies nationwide for investigative purposes. There were no current records associating the sender or receiver with the corresponding addresses listed on the parcel.

9. On December 23, 2021, I utilized USPS databases to learn the return address is fictitious.

10. Canine Examination:

- a. On December 23, 2021, at approximately 11:37 a.m., I met with Supervisory Border Patrol Agent Canine Handler Chris Jbara and his canine partner Toto. Agent Jbara’s canine is trained and certified to detect the odors of marijuana, heroin, cocaine, methamphetamine and their derivatives. I placed SUBJECT PARCEL 1 in a cleared area for examination by Agent Jbara and Toto. Agent Jbara informed me at approximately 11:42 a.m. that Toto alerted to SUBJECT PARCEL 1, indicating the presence of narcotics or a controlled substance, or other evidence with an odor of narcotics or a controlled substance within the parcel.

11. Based on the facts set forth in this affidavit, I believe there is probable cause to show that SUBJECT PARCEL 1 contain controlled substances and/or proceeds from the sale of controlled substances, constituting evidence of

violations of Title 21, United States Code, Sections 841 (a) (1), Possession with Intent to Distribute a Controlled Substance, and 843 (b), Unlawful Use of a Communication Facility to Facilitate the Distribution of a Controlled Substance.

12. This affidavit is submitted for the limited purpose of seeking authorization to search SUBJECT PARCEL 1.

William P. Akins

William P. Akins
United States Postal Inspector

Subscribed and sworn to me telephonically on
This 27th day of December, 2021

Lynnette C. Kimmins

Lynnette C. Kimmins
United States Magistrate Judge